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July 6, 2020

VIA ECF ONLY

Magistrate Judge Sanket J. Bulsara
United States District Court - Eastern District of New York
Chambers 304N
225 Cadman Plaza East
Brooklyn, New York 11201

RE: Louden v. Mohammed Pasha, et ano.
Docket No.: 19-cv-06460 (FB)(SJB)

Dear Magistrate Bulsara:

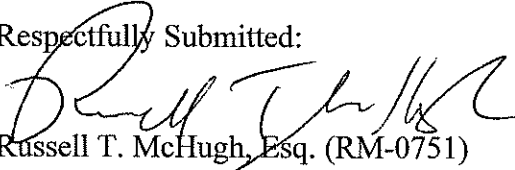
The undersigned represents the Plaintiff, Janice Louden, in the above-captioned matter. Please accept this correspondence as a joint status report from counsel.

Discovery remains outstanding. Plaintiff's deposition has been scheduled for August 5, 2020, via Skype, Zoom or other agreed upon service. The defendant's deposition will be scheduled by August 31, 2020. If the case does not settle, then Ms. Louden may need to appear for an independent medical examination in New York on or before the scheduled conference date of October 27, or as soon thereafter as may be safe, given the pandemic. Authorizations to obtain medical records were served previously. However, plaintiff agrees to serve a copy of medical records in plaintiff's possession on defense counsel within two (2) weeks of today's date, on or before July 20, 2020. Defendants are to serve responses to the Plaintiff's First Set of Interrogatories and First Request for Production of Documents and Tangible Things, also on or before July 20, 2020.

This will also confirm that a status conference is scheduled to be held on October 27, 2020 at 10:00 AM, hopefully in Courtroom 324N before Your Honor.

Thank you for your time and consideration in this matter.

Respectfully Submitted:



Russell T. McHugh, Esq. (RM-0751)

CC: Counsel of Record via ECF